



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

SEP 13 1994

Ms. Jane B. McAllister
Ahlers, Cooney et al.
100 Court Avenue, Suite 600
Des Moines, Iowa 50309-2231

Dear Ms. McAllister:

Re: RCRA Storage Permit

This is in response to your July 20, 1994 letter which provided an explanation of the management procedures for the fluorescent lamp recycling facility addressed in your April 28, 1994 letter. You specifically requested the Environmental Protection Agency's (EPA) Region VII position regarding the necessity for a Resource Conservation and Recovery Act (RCRA) storage permit if the facility holds the incoming spent fluorescent lamps less than twenty-four (24) hours after receipt prior to recycling.

Based upon our review of the information provided in your letter, a twenty-four hour timeframe in which to hold the spent fluorescent lamps is acceptable. A RCRA storage permit will not be required if the spent fluorescent lamps are on-site less than twenty-four hours after receipt prior to recycling and the facility is operated in accordance with Title 40 Code of Federal Regulations (CFR) § 261.6(c)(2).

Please be aware that on July 27, 1994, EPA published in the Federal Register (59 FR 38288) a proposed rule regarding revised management standards for mercury-containing lamps. EPA is seeking comments on two alternative approaches for the management of mercury-containing lamps. Dependent upon the outcome of the proposed rule, the necessity for a RCRA storage permit may require revaluation.

If you have any questions regarding this letter, please contact Don Lininger at (913) 551-7724.

Sincerely,

Lyndell L. Harrington
Lyndell L. Harrington
Chief, RCRA Branch
Waste Management Division



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RCRA Records Center